

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

PROMESA
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION REGARDING CONSENSUAL EXTENSION OF
DEADLINES SET FORTH IN THE PROTOCOL AND SCHEDULE IN RESPONSE TO
THE COURT’S ORDER ENTERED ON MAY 22, 2018 (ECF NO. 3217)**

¹ The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

To the Honorable United States Magistrate Judge Judith Gail Dein:

1. Assured Guaranty Corp., Assured Guaranty Municipal Corp., National Public Finance Guarantee Corporation, and the Ad Hoc Group of General Obligation Bondholders (collectively, the “Movants”) and (ii) the Financial Oversight and Management Board for Puerto Rico (“FOMB”), and the Commonwealth of Puerto Rico (the “Commonwealth”), by and through FOMB as the Commonwealth’s representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF” and together with FOMB and the Commonwealth, the “Respondents”, and together with the Movants, the “Parties”) respectfully file this informative motion notifying the Court of the Parties’ agreement to extend deadlines in the *Stipulation and Order Setting Forth the Protocol and Schedule in Response To the Court’s Order Entered on May 22, 2018 (ECF No. 3121)* (ECF No. 3217) (the “Protocol”).

2. Pursuant to the Protocol, Respondents’ response to Movants’ June 1, 2018 letter, including supporting declarations, is due on or before Friday, June 22, 2018, and Respondents are thereafter required to make any declarants available for deposition within twenty-one (21) days after Movants have written to Respondents requesting such depositions.

3. The Parties have agreed to extend the deadline for Respondents’ response to Movants’ June 1, 2018 letter, including supporting declarations, to Friday, June 29, 2018.

4. The Parties have also agreed that AAFAF and FOMB will each make two (2) witnesses available for deposition within fourteen (14) days after Movants have written to Respondents requesting such depositions. The remaining depositions shall occur within the time period originally stipulated and so ordered.

² PROMESA has been codified in 48 U.S.C. §§ 2101–2241.

5. All other provisions of the Protocol remain in full force and effect.

Dated: New York, New York
June 21, 2018

CASELLAS ALCOVER & BURGOS P.S.C.

CADWALADER, WICKERSHAM & TAFT
LLP

By: /s/ Heriberto Burgos Pérez
Heriberto Burgos Pérez
USDC-PR 204809
Ricardo F. Casellas-Sánchez
USDC-PR 203114
Diana Pérez-Seda
USDC-PR 232014
P.O. Box 364924
San Juan, PR 00936-4924
Telephone: (787) 756-1400
Facsimile: (787) 756-1401
Email: hburgos@cabprlaw.com
rcasellas@cabprlaw.com
dperez@cabprlaw.com

*Attorneys for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.*

By: /s/ Howard R. Hawkins, Jr.
Howard R. Hawkins, Jr.*
Mark C. Ellenberg*
Ellen V. Holloman*
Ellen M. Halstead*
Gillian Groarke Burns*
Thomas J. Curtin*
Casey J. Servais*
200 Liberty Street
New York, NY 10281
Telephone: (212) 504-6000
Facsimile: (212) 406-6666
Email: howard.hawkins@cwt.com
mark.ellenberg@cwt.com
ellen.holloman@cwt.com
ellen.halstead@cwt.com
gillian.burns@cwt.com
thomas.curtin@cwt.com
casey.servais@cwt.com

* Admitted *pro hac vice*

*Attorneys for Assured Guaranty Corp. and
Assured Guaranty Municipal Corp.*

ADSUDAR MUÑOZ GOYCO SEDA &
PÉREZ-OCHOA, PSC, P.S.C.

By: /s/ Eric Pérez-Ochoa

Eric Pérez-Ochoa
USDC-PR No. 206,314
Luis A. Oliver-Fraticelli
USDC-PR NO. 209,204
208 Ponce de Leon Ave., Suite 1600
San Juan, PR 00936
Telephone: (787) 756-9000
Facsimile: (787) 756-9010
Email: epo@amgprlaw.com
loliver@amgprlaw.com

*Attorneys for National Public Finance
Guarantee Corporation*

WEIL, GOTSHAL & MANGES LLP

By: /s/ Jared R. Friedmann

Marcia Goldstein*
Jonathan Polkes*
Gregory Silbert*
Jared R. Friedmann*
Adam J. Bookman*
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007
Email: marcia.goldstein@weil.com
jonathan.polkes@weil.com
gregory.silbert@weil.com
jared.friedmann@weil.com
adam.bookman@weil.com

* Admitted *pro hac vice*

*Attorneys for National Public Finance
Guarantee Corporation*

JIMÉNEZ, GRAFFAM & LAUSELL

By: /s/ J. Ramón Rivera Morales

J. Ramón Rivera Morales
USDC-PR No. 200701
Andrés F. Picó Ramírez
USDC-PR No. 302114
PO Box 366104
San Juan, PR 00936-6104
Telephone: (787) 767-1030
Facsimile: (787) 751-4068
Email: rrivera@jgl.com
apico@jgl.com

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON, LLP

Andrew N. Rosenberg*
Kyle J. Kimpler*
Karen R. Zeituni*
1285 Avenue of the Americas
New York, NY 10019
Telephone: (212) 373-3000
Facsimile: (212) 757-3990
Email: arosenberg@paulweiss.com
kkimpler@paulweiss.com
kzeituni@paulweiss.com

* Admitted *pro hac vice*

*Attorneys to the Ad Hoc Group of General
Obligation Bondholders*

ROBBINS, RUSSELL, ENGLERT,
ORSECK, UNTEREINER & SAUBER LLP

By: /s/ Kathryn S. Zecca

Lawrence S. Robbins*
Mark T. Stancil*
Gary A. Orseck*
Kathryn S. Zecca*
Ariel N. Lavinbuk*
Donald Burke*
1801 K Street, NW
Washington, D.C. 20006
Telephone: (202) 775-4500
Facsimile: (202) 775-4510
Email: lrobbins@robbinsrussell.com
mstancil@robbinsrussell.com
gorseck@robbinsrussell.com
kzecca@robbinsrussell.com
alavinbuk@robbinsrussell.com
dburke@robbinsrussell.com

* Admitted *pro hac vice*

*Attorneys to the Ad Hoc Group of General
Obligation Bondholders*

O'NEILL & BORGES LLC

By: /s/ Hermann D. Bauer

Hermann D. Bauer
USDC No. 215205
250 Muñoz Rivera Ave., Suite 800
San Juan, PR 00918-1813
Telephone: (787) 764-8181
Facsimile: (787) 753-8944
Email: hermann.bauer@oneillborges.com

PROSKAUER ROSE LLP

By: /s/ Gregg M. Mashberg

Martin J. Bienenstock*
Stephen L. Ratner*
Timothy W. Mungovan*
Paul V. Possinger*
Gregg M. Mashberg*
Eleven Times Square
New York, NY 10036
Telephone: (212) 969-3000
Facsimile: (212) 969-2900
Email: mbienenstock@proskauer.com
sratner@proskauer.com
tmungovan@proskauer.com
ppossinger@proskauer.com

* Admitted *pro hac vice*

*Attorneys for the Financial Oversight and
Management Board and as representative of
the Commonwealth*

MARINI PIETRANTONI MUNIZ, LLC

By: /s/ Luis C. Marini-Biaggi

Luis C. Marini-Biaggi
USDC No. 222301
MCS Plaza, Suite 500
255 Ponce de León Ave.
San Juan, PR 00917
Telephone: (787) 705-2171
Facsimile: (787) 936-7494
Email: lmarini@mpmlawpr.com

O'MELVENY & MYERS LLP

By: /s/ Elizabeth L. McKeen

John J. Rapisardi*
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000
Facsimile: (212) 326-2061
Email: jrapisardi@omm.com

Peter Friedman*
1625 Eye Street, NW
Washington, DC 20006
Telephone: (202) 383-5300
Facsimile: (202) 383-5414
Email: pfriedman@omm.com

Elizabeth L. McKeen*
610 Newport Center Drive, 17th Floor
Newport Beach, CA 92660
Telephone: (949) 823-6900
Facsimile: (949) 823-6994
Email: emckeen@omm.com

* Admitted *pro hac vice*

*Attorneys for the Puerto Rico Fiscal
Agency and Financial Advisory Authority*